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Attorneys for Defendants  
SAKHAWAT KHAN and ROOMY KHAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

VILMA SERRALTA,

Plaintiff,

v.

SAKHAWAT KHAN, ROOMY KHAN  
And DOES ONE through TEN, inclusive,

Defendants.

CASE NO.: CV 08 1427 EDL

**DECLARATION OF STEPHEN  
TAEUSCH IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
ORDER PERMITTING  
WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL**

(Civ. L.R. 7-11 and 11-5)

1 I, Stephen Taeusch, declare as follows:

2 I am an associate in the law firm of Wilson Sonsini Goodrich & Rosati, Professional  
3 Corporation (“WSGR”). I am admitted to practice before the courts of the State of California. I  
4 submit this declaration in support of the concurrently filed Motion for Order Permitting  
5 Withdrawal and Substitution of Counsel. I have personal knowledge of the following facts and  
6 can testify competently to those facts:

7 1. WSGR’s withdrawal as counsel of record for Defendants Sakhawat and Roomy Khan  
8 (“Defendants”), and the accompanying Motion for Order Permitting Withdrawal and  
9 Substitution of Counsel, are based on California Rule of Professional Conduct 3-700(C)(5)  
10 (client knowingly and freely assents to termination of representation). Defendants have  
11 informed me that, in light of the parties’ recent failure to settle their dispute through court-  
12 sponsored mediation, the protracted nature of the litigation, and the likelihood that this matter  
13 will proceed to trial, Defendants do not have the financial ability to pay WSGR’s hourly rates  
14 and have determined that it is in their best interests to represent themselves in this matter as  
15 litigants *pro se*.

16 2. Defendants are aware of the consequences of representing themselves *pro se*, and are  
17 prepared to do so if they are unable to secure counsel that is more affordable.

18 3. WSGR will take whatever steps are necessary to facilitate its prompt and smooth  
19 withdrawal as counsel.

20 4. On November 17, 2008, I first informed Counsel for Plaintiff, Matthew Goldberg of  
21 Legal Aid Society–Employment Law Center and Hillary Ronen of La Raza Centro Legal, Inc.,  
22 of Defendants’ intent to seek an order permitting WSGR to withdraw as Defendants’ counsel of  
23 record. On November 21, 2008, Defendants filed a Motion for Administrative Relief to  
24 Approve Withdrawal of Counsel. On December 1, 2008, the Court denied Defendants’ Motion,  
25 without prejudice to re-filing after Defendants responded to Plaintiff’s Motion to Compel and  
26 complied with any outstanding discovery requests not subject to reasonable objections. The  
27 Court indicated that withdrawal would then be allowed only if Defendants concurrently  
28 substituted themselves in *pro se* or appeared through new counsel.

